

Federal Communications Commission
August 28, 2003

Re: RM-10787 (NCVEC petition to eliminate Morse requirement for amateur exams)

Dear Commissioners:

While I support the intent of this proposed rulemaking, there are two ramifications that must also be addressed. Until they are, I cannot support this particular petition as it stands.

1. **Tech access to HF.** This is a good thing, but the petition does not go far enough. This is a chance to correct a problem that has existed since 2M FM came into common use in the late 1960s. The Technician license was originally intended to be an experimenter class. At the time it was created, operation above 30 MHz was difficult. There were few commercial manufacturers making equipment, parts were big and expensive, there were no band plans, and there were not too many people to talk to on those frequencies. It was thus a place for true experimenters. As the state-of-the-art increased the practical frequency range and as all classes of license started using the VHF and UHF bands, the Technician license should have been restricted to higher and higher frequencies (admittedly an unworkable proposition). Instead, it became the de-facto entry class, but there was no reason for many to upgrade. Most did not upgrade and come into the mainstream of amateur radio – the HF bands – and as a result they have become second-class citizens. Giving them HF access will go a long way toward fixing this problem, essentially breathing new life into the old Novice class while still calling them Technicians. However, this petition only proposes to give them Novice privileges, which are all CW-related. I believe they, and Novices, should be given a 25 KHz section of the upper end of the currently unused Novice CW sub-bands in which they could use phone. In other words, the phone bands should be extended down on 80, 40 and 15 Meter bands by 25 KHz, with all classes of license having access to them. This would give the new HF-users some valuable experience at HF operating *that they will actually use* and an incentive to upgrade so they could use the whole band.
2. **License exams.** Element 1 has long been regarded as a filter that has helped keep the amateur service from degenerating into the mess that has befallen the Citizen's Band. Many have commented on the "dumbing down" of the amateur exams to the point that the Morse proficiency test is the only thing standing in the way of bedlam. If that test is eliminated, the other exams should be made harder to compensate. In particular, knowledge of digital communications (including knowledge of Morse characters) should be added to the written tests for all classes of license.
3. **Existing Techs should not be given privileges that they did not have to earn.** If Techs are given Novice privileges without having to take a test that everyone else had to take, some amateurs who think the newcomers got undeserved "amnesty" will treat them poorly. To prevent this, they should have to take a

“replacement Element 1” exam, which would be a written test on digital modes, the questions for which would be added to the pool for all other new licensees. This would really help keep some misguided amateurs from treating the newcomers badly, while adding needed difficulty to the tests.

I personally prefer CW to all other modes. Anybody can talk, but few can show off a true skill. Unfortunately, though, I have to agree that many who would have made great hams were locked out unnecessarily because of inability to learn Morse code. I therefore support the elimination of the code requirement, but ONLY if the other safeguards to the amateur service noted above are put in place at the same time.

Sincerely,

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